



THE HOTLINE

ROUTING

SARAH SAYS:
It's What We Do

It's tough selling a trade association. Add tight times and tight wallets--forget about it! What the hell does a trade association do, anyway? How does it affect your bottom line? Don't you hire staff to know what the latest government regulations and to deal with the FAA? It seems like employees are always going to meetings, why do they need to attend another Symposium?

Well, we don't know what other associations do, but the Aeronautical Repair Station Association (ARSA) saves you and your people time, money and heartache. We stop our members from having to look for the source; when it comes to aviation maintenance issues, we are the source. We give each member personal attention, we can send them information directly to them or refer them to the specific source. We influence the policy and help write the rules.

We are small and powerful. We are Linda Bosarge, Business Manager and Majority Whip--the nerve center. If you want something done right--Linda does it. She runs the membership services, runs the Annual Symposium and generally runs the life of Sarah MacLeod, that's me, your Executive Director. We are Anthony Obadal, the Managing Director and Grand Master, along with Jason Dickstein, the Associate Editor of this newsletter. The Managing and Executive Directors report to and have a vote on the Board of Directors. The full Board is listed in every hotline. We are also, Jody Husser, who answers the phones, formats the hotline and files all the paperwork.

We send out a newsletter every month to over 2000 international addresses, put on an Annual Symposium for over 200 people, attend Aviation Rulemaking Advisory

Committee (ARAC) meetings, write advisory material for ARAC Working Groups, serve as the Vice-Chair of ARAC, keep members informed of the latest developments in the rules, as well as FAA policy and legal interpretations. We have developed a JAR-145 acceptance manual, a guide to obtaining Part Manufacturing Approvals (PMAs) and co-authored Phase III (see related article page 2). Every nugget of information can save your company hours of fruitless searching.

By being on the cutting edge of regulatory developments, we can give a member the benefit the collective knowledge of the industry which helps that individual company choose the most flexible commercial road. The aviation industry's commercial relationships depend upon FAA interpretation of regulatory requirements. Your pocketbook is directly impacted by the local inspector's spin on the paperwork, training or data requirements of federal regulations. If your quality control manager does not know the international thinking on these issues, thousands of dollars can be spent to satisfy a local FAA office, right before the FAA National office issues a contrary interpretation or policy.

This editorial is for those of you who control the purse strings. The Association's members who have called to ask questions, know the value of our services. Unfortunately, the people who call are not the ones signing the membership checks. This Association provides invaluable information as part of your membership dues. We help your people do their jobs smarter, better and faster. We can save you every dime spent on membership fees in one phone call and we have a reputation for being good in a pinch.

As your Executive Director and as an independent counselor at law, I am often in a dilemma of how much bread to cast upon the water. This trade association hired me to manage its affairs, build its membership and to represent the interests of the entire

maintenance industry before the FAA and occasionally Congress. It did not hire my legal expertise. Therefore, when a call is received from a member, the Executive Director of the Association, forwards any information available from the FAA and industry. The Executive Director will also discuss which direction the FAA is looking nationally and what has been found acceptable in various local offices of the FAA regions or internationally. In that capacity, I will not render a legal opinion on the particular matter which a member may be interested in resolving.

If a member needs to resolve an issue faster than it takes to get an FAA national policy issued or FAA legal opinion rendered, or needs advice because it has been issued a Letter of Investigation, the Association will offer general industry knowledge and advice. That knowledge and advice may be enough to help you resolve the issue yourself. If on the other hand, you are in too deep, Sarah MacLeod, partner of Obadal and MacLeod, p.c. will charge a member One Hundred Seventy Five and a non-member One Hundred Ninety-Five an hour for her legal expertise and no doubt resolve the issue in a timely and efficient manner. Either way, it is what we do.➔

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REGULATORY OUTLOOK

Phase III To ARAC

Phase III, guidance on how you review your current inventories to determine whether they may be considered eligible for installation on civil aircraft is being referred to ARAC for a vote. The Working Group has voted to resolve the outstanding issues by allowing submission of minority opinions and has forwarded those opinions as well as the agreed upon version of the Advisory Circular to ARAC for General Aviation and Air Carrier Maintenance Issues. ARSA was not only instrumental in developing and writing the AC, but also has a vote on ARAC.

Members interested in receiving a copy of the documents submitted to ARAC for vote should FAX a request to our headquarters. ARAC will either vote to forward the document to the FAA as a recommendation or send it back to the Working Group for further clarification. The ARAC vote is scheduled for early February. →

Even Regulators Get the Blues

With the ghost of Christmas passed and a new year upon us, government office buildings are once again abuzz with the chatter of typewriters and the scratch of pencils as an army of indentured public servants stave off post-holiday blues by immersing themselves in paper work. In an effort to maintain their high spirits, government regulators revel in the spirit of giving by promising to give us more rules and regulations.

Twice a year the government scares the Dickens out of the American people by publishing a Regulatory Agenda. The Agenda represents a laundry list of pending and recently completed regulatory projects, including a brief description of the activity and the name and phone number of the agency contact. The Unified Regulatory Agenda, representing the regulatory aspirations of the entire executive branch, performs the dual purposes of keeping the public informed while serving to remind Congress just what the regulatory agencies do in return for the tax dollars that disappear into their maws each year.

In preparation for the fall/winter 1994 Regulatory Agenda, Vice-President Al Gore convened a meeting of the President's advisors to discuss priorities. He reaffirmed the Administration's commitment "to regulate only when necessary, and then in the most cost-effective manner." With this admonition in mind, the nation's bureaucracy exercised the same restraint as a child with a copy of the Sears Christmas catalog and an envelope addressed "North Pole" by making this year's Regulatory Agenda only 1638 pages long

(no, really - these are just the regulations we NEED).

1995 is a brand new year and while Johnny looks forward to a year of bloody noses and bruised shins thanks to the Roller Blades his parents chose from the Sears Catalog, our businesses can look forward to the same thing courtesy of the U.S. Regulatory Agenda.

- We lead off the FAA 1995 wish list with the continuing plan to amend the repair station and repairmen certification rules. The Administration plans to revise the regulations to reflect the current international and domestic environment and needs; the rulemaking project is reviewing foreign repair station requirements as well. A Notice of Proposed Rulemaking (NPRM) is scheduled for publication in August 1995. Don't hold your breath, an NPRM for this change has been scheduled for "August" of each year for the past three! For more information, contact Leonard Colp at (202) 267-8283.
- The FAA also hopes to expand the class of person authorized to maintain aircraft by allowing rotorcraft and small airplane pilots to perform certain defined tasks. The rule change would add to the definition of preventative maintenance the removal and installation of approved seats, litters and doors, and the removal and replacement of medical oxygen bottles under certain conditions. Most changes addressed in this NPRM have been seen in the context of exemptions, so we don't expect anything startling from this proposal. An NPRM for this rule change was scheduled for October 1994. For more information, contact Ed Ortiz at (202) 267-3806.
- A number of projects are assigned to ARAC, including revision of the airworthiness standards for transport category aircraft and engines and fatigue test requirements for aging aircraft. For more information, contact Bill Henry at (202) 267-3804.

ARSA CONTACTS

THE HOTLINE is published monthly by the Aeronautical Repair Station Association, the not-for-profit international association of certified Repair Stations.

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Frank Langworth Treasurer
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Jason A. Dickstein Associate Editor

REGULATORY OUTLOOK

- Other new regulations would revise part 35 by adding requirements for composite propellers. The new requirements are expected to address fatigue evaluation, bird impact and lightning protection. Remember, when the FAA regulates the construction, that means you've got to fix it THEIR way. Once again, the deadline for releasing the NPRM has already passed and no regulatory language has yet been published. For more information, contact Marty Buckman at (617) 273-7079.
- A fuel pressure indicator is no longer the only feasible means available to warn pilots of fuel pump failure or imminent fuel pressure loss. In a proposal expected to allow manufacturers to use new technology which will improve engine operation, economy and life, the FAA suggests an amendment to the certification requirements for fuel pressure indicators on pump-fed engines that would permit alternative means of warning pilots. For more information, contact J. Lowell Foster at (816) 426-5688.
- An NPRM originally scheduled to come out this month proposes to relieve regulated persons of the duty to comply with the literal language of the Federal Aviation Regulations. This relief would be limited to circumstances where the spirit of the regulation was performed in such a way as to maintain an equivalent level of safety. This would allow the industry to experiment with techniques that actually enhance safety and efficiency, but may be forbidden because they were not contemplated at the time the regulations were drafted. Alternative means of compliance with respect to Airworthiness Directives has been assigned to ARAC. For more information, contact Linda Williams at (202) 267-9685.
- The FAA is considering a rule that would require all air operators to make sure their flight attendants are able to understand English. Its too bad that the FAA has no plans to require the same proficiency of certificated mechanics on the international front (and thank goodness those parts catalogs are illustrated, albeit unapproved). For more information, contact Donell Pollard at (202) 267-3735.
- Finally, the FAA intends to form a new "part 66" that will prescribe the certification and training requirements for mechanics and repairmen. The new regulations will establish training programs and will clarify eleven different certification, training, experience and currency requirements for certification. This NPRM was published in 1994 and

a final rule is still pending. For more information, contact Leslie Vipond at (202) 267-3269.

How long does it take to promulgate a final rule? A quick glance at the completed projects section shows that most rules take about four or five years to finalize from the date an NPRM is published. Some may take as long as eight years. With maddeningly slow processes like these, it's no wonder that regulators get the blues. →

*ARAC Operating
Instructions Available,
But Batteries are Still Not Included*

Are you dying to dive into the aviation rulemaking process? You already know that individuals may engage directly in rulemaking through participation in ARAC Working Groups. But how does ARAC really work? Without an understanding of the procedures, diving into ARAC can seem like diving into a swimming pool with no water.

In late 1993, ARAC and the FAA issued two documents describing their operating procedures. The first document consisted of operating instructions for ARAC working groups. The second described the FAA internal procedures for supporting ARAC initiatives. Although each of these documents was internally consistent, the two documents assigned overlapping and conflicting areas of responsibility and in some places even contradicted one another.

In order to remedy the problem, ARAC produced a single set of guidelines to govern both aspects of the ARAC-FAA partnership - *Operating Procedures for the Aviation Rulemaking Advisory Committee*. These rules cover ARAC organization and responsibilities, and also define the process by which ARAC and the FAA work together on a new regulation. They are a must for anyone with an interest in aviation regulation.

Copies of the *Operating Procedures* are available to members who fax their request to ARSA at (703) 739-9488 [editors note: many of you sent in requests for this publication before the first of the year, which was before the manuals had been completed; if your request has not been honored, please send in a fresh request now]. →

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INTERNATIONAL AFFAIRS

Covet Thy Neighbor's Business

Are you considering a business relationship with a Canadian or Mexican client? Many businesses considering international relationships are put off by the prospects of prohibitively high tariffs. Take heart, though: goods transferred across North American international borders are not subject to customs duties.

Aircraft repair has always enjoyed duty-free treatment. [This practice was reaffirmed in the North American Free Trade Agreement (NAFTA), the recent trade agreement between the United States, Mexico and Canada.] Under NAFTA, no party to the agreement may apply a customs duty to anything imported temporarily for repair or alteration from the territory of either of the other two. Further, no party may apply a customs duty to any good, regardless of its original source, that re-enters its territory after that good was exported to another treaty signatory for repair or alteration.

As a general rule, aeronautical repair stations may send or receive assemblies for repair to or from Mexico or Canada without fear of incurring customs duties during the cross-border transfer. For more information, call the local customs house at the border-crossing point you intend to use, call the U.S. Customs general information hotline at (202) 927-6724 (recorded messages) or call the main Customs number (202) 622-2111 (live human beings).→

Join the North American Customs Love-In

The United States, Canadian and Mexican customs administrations have been working together to standardize trade documents and data, in an effort to expedite and improve international trade in North America. They aim to smooth the processes associated with international trade in North America. Plans call for making greater use of commercial data like purchase orders as the basis for customs information. The administrations also plan to make customs data available electronically.

The next step in the plan is to take their proposals to the trade community. Briefings have already taken place in Juarez, Mexico and Toronto, Canada. The American briefing will take place in San Antonio this March. More information on this is available by contacting Bill Nolle at the Office of Strategic Trade in Washington, D.C. - (202) 927-0541 (voice) or (202) 927-0335 (fax).

Increased U.S.-Canada customs cooperation is especially important in light of the December 22, 1994 announcement permitting direct air service to Canada from dozens of new U.S. cities.→

Get Your JAA Documents While They're Hot!

Prices for Joint Aviation Authority (JAA) publications have increased for 1995!

The JAA makes a number of publications available to the public, including the Joint Aviation Regulations (JARs), background material describing the JAA, maintenance guidance materials and procedures, and the list of JAA approved/accepted maintenance organizations.

For a complete list of available JAA publications and prices, members may fax their request to ARSA at (703) 739-9488.→

CORRECTION:

Last month's issue of the Hotline listed Paul Murphy's (Chair of the Maintenance Recordkeeping Requirements Working Group) phone number incorrectly. His phone number is (303) 872-2132.

Pass • Around • The Hotline

The ARSA Board of Directors and The Hotline staff encourage you to forward copies of The Hotline to your co-workers and other members of the industry. We feel that open exchange of ideas among the members of our industry is crucial and encourage the use of The Hotline to help achieve that goal. Your ideas, comments and suggestions are needed here.

You will be listened to. So, please contribute to and distribute The Hotline.

This month's Legal Brief come to us from the desk of Jason Dickstein, Senior Associate of The Law Firm of Obadal and MacLeod, p.c. who was also recently appointed the position of Associate Editor of *The Hotline*. The article was inspired by a legal opinion rendered by Don Byrne, FAA's Assistant Chief Counsel Regulations & Enforcement Division, issued to GE Engines on June 21, 1991.

The article was edited by Marshall S. Filler, Esquire, from the law firm of Filler, Weller and Tello, P.C., 901 Fifteenth Street, N.W., Suite 901, Washington, DC 20005 TEL: (202) 457-7760, FAX: (202) 872-1652.

Members wishing a copy of Don Byrne's legal interpretation should FAX a request to the Association's headquarters.

PART 145.2: THE CLAWS THAT CATCH

Pursuant to section 145.2 of the FAR, every certificated repair station that performs maintenance for a Part 121 air carrier is required to comply with almost all of the maintenance regulations in Subpart L of Part 121. The four exceptions are those sections (1) assigning the air carrier final responsibility for airworthiness, (2) requiring the air carrier to develop a maintenance manual, (3) require the air carrier to have a system for continuing analysis and surveillance, and (4) granting the air carrier authority to perform maintenance on its own aircraft.

The other clauses in Subpart that can bite a repair station include recordkeeping requirements, duty time limitations and the requirement that maintenance be performed according to the air carrier's internal maintenance procedures. This Legal Brief is devoted to the duty time requirements. Future articles will deal with other claws in Subpart L that tend to catch our members unaware.

Clause 1: Duty Time

How often does a major overhaul require your repair station to work three shifts around the clock in order to meet a deadline? Do your employees work seven days a week for weeks at a time in order to finish major projects? If they do, then you may be violating the hours-of-service limitation contained in Section 121.377 of the FAR.

Even when there's a major project to complete, and even when the union contract doesn't require it, a repair station may be compelled by law to give mechanics time off. The aviation regulations demand that mechanics working on Part 121 aircraft must have 24 consecutive and uninterrupted hours of time off-duty each week. Rest periods taken in segments less than 24 hours do not count toward the 24 hour requirement.

The regulations allow for equivalent time off to be taken during a calendar month, which means that off duty time may be postponed as long as it is taken in the same calendar month.

For example, a mechanic performing alterations on Part 121 aircraft during the month of February (which has twenty-eight (28) days) must take four days off any time during that month to compensate for the four seven day work periods.

If the mechanics only work on Part 121 aircraft part of the time, and they devote the remainder of their time to other projects, the repair station is nonetheless subject to the duty-time limitations of Part 121. So, if the repair station spends only 10% of its time repairing Part 121 aircraft and 90% of its time repairing non-aviation parts (like boat engines), it is still required to comply with this section.

Supervisory and executive personnel who perform work for Part 121 operations are also subject to Section 121.377. If the supervisor only renders general advice and does not actually perform maintenance for the Part 121 aircraft, he/she would not be subject to the Part 121 duty-time limitations.

What can a repair station faced with a major project and a looming deadline do if compliance with this rule is a problem?

If the project is short enough to complete within the calendar month and if the repair station plans to be less busy at the end of the month, then off-duty time may be deferred until later in the month; however, off-duty days attributable to the duty-time limitation absolutely must be taken during the calendar month in which they accrue.

Another remedy would be to bump all of the employees back one shift once a week during a crunch time. This rotation should provide each employee with the 24 consecutive hour relief required by the regulations, but in its most basic form it requires that one shift on one day each week be shut down while all employees are cycled back one shift. A little creative scheduling (staggering the cycle-back days) may relieve the problems of a one-shift shutdown although the potential for short staffing must be carefully addressed under these circumstances. ➔

EMPLOYMENT LAW CORNER

*The Thought Police are in our Midst -
Don't Even THINK about asking these questions!*

What if the government told you not to ask certain questions? Picture a nation that restricted its citizens from talking about physical handicaps. Imagine if the law prohibited you from asking a job candidate whether a disability would interfere with his or her ability to adequately perform the job! Orwell's 1984? No: Clinton's 1994.

The Americans With Disabilities Act (ADA) prohibits an employer (with 15 or more employees) from asking a job candidate questions that have the effect of screening out individuals with disabilities. The Equal Employment Opportunity Commission (EEOC) has published a technical assistance manual describing permitted and prohibited activities. It includes lists of questions that may or may not be asked of job candidates.

During the interview stage, the EEOC forbids all direct inquiries about disabilities. The employer is prohibited from asking any question that might tend to reveal a disability. The employer is prohibited from asking any question that might reflect the effects of a disability. While the employer may ask a job candidate whether the candidate is able to meet the company's attendance requirements, the employer may not ask how many sick days the candidate has taken previously.

Copies of the EEOC Technical Assistance Manual may be obtained by calling the EEOC at 1-800-669-3362. Ask for document number 915.002.➔

The EEOC PROHIBITS the following queries because they inquire about disabilities:

- ✘ *Do you have a disability that would interfere with your ability to perform the job?*
- ✘ *How many days were you sick last year?*
- ✘ *Have you ever filed for workers' compensation?*
- ✘ *Have you ever been injured on the job?*
- ✘ *How much alcohol do you drink each week?*
- ✘ *Have you ever been treated for alcohol problems?*
- ✘ *What prescription drugs are you currently taking?*
- ✘ *Do you have AIDS?*
- ✘ *Do you have asthma?*

The EEOC APPROVES of these queries because they do not address disabilities:

- ✔ *Can you perform the functions of this job (essential and/or marginal) with or without reasonable accommodation?*
- ✔ *Please describe how you would perform these functions...*
- ✔ *How many days leave did you take last year?*
- ✔ *Can you meet the attendance requirements of this job?*
- ✔ *How did you break your leg?*
- ✔ *Do you illegally use drugs?*
- ✔ *Have you used illegal drugs in the last two years?*
- ✔ *Do you have a cold?*

In this installment of the continuing ARAC saga, we bring you the complete list of working groups (and their related tasks) for which the Assistant Chair for Air Carrier Operations is responsible.

Air Carrier Operations Issues:

Assistant Chair:
William W. Edmunds, Jr., APA
Phone: (703) 689-2270
FAX: (703) 689-4370

Alternate Assistant Chair:
Norm Joseph, ADF
Phone: (404) 304-9644
FAX: (404) 715-1981

Assistant Executive Director:
Quentin Smith
Phone: (202) 267-5819
FAX: (202) 267-5229

Noise Abatement Takeoff Profiles Working Group

[NOTE: This working group has made its final recommendations to the FAA; no further activity will take place.]

FAA Rep.: Wes Euler
Phone: (202) 267-8452
FAX: (202) 267-5230

ARM Liaison: Larry Buehler
Phone: (202) 267-8580
FAX: (202) 267-5075

Task: Determine close in (flaps down) and distant (flaps up) standard takeoff profiles and prepare the material for incorporation into AC 91-53.

Fuel Requirements Working Group

Chair:
Donald Patterson, Boeing
Phone: (206) 237-7577
FAX: (206) 234-4859

FAA Rep.: Kathy Hakala
Phone: (202) 267-3762
FAX: (202) 267-5229

ARM Liaison: Larry Buehler
Phone: (202) 267-8580
FAX: (202) 267-5075

Task: Determine fuel supply requirements for international and overseas operations including criteria for minimum fuel, diversion fuel, contingency fuel and alternate fuel. Determine fuel requirements related to redispatching.

Autopilot Engagement Requirements Working Group

Chair: Webster Heath
Phone: (202) 785-5913
FAX: (703) 785-5186

FAA Rep.: Dick Temple
Phone: (202) 267-5824
FAX: (202) 267-5086

ARM Liaison: Linda Williams
Phone: (202) 267-9685
FAX: (202) 267-5075

Task: Determine the criteria for autopilot engagement. The current regulation (section 121.579) does not address existing autopilot technology. This working group would require the expertise of TERPS specialists, flight test engineers, and air carrier pilots.

Wet Leasing Working Group [This working group has been disbanded.]

Leader: Vance Fort, NACA
Phone: (703) 834-9405
FAX: (703) 834-9412

FAA Rep.: Dave Catey
Phone: (202) 267-8094
FAX: (202) 267-5086

ARM Liaison: Linda Williams
Phone: (202) 267-9685
FAX: (202) 267-5075

Task: Determine the criteria that parties to lease agreements must meet including operational control criteria, the kinds of operations authorized, and the specific procedures and limitations to be incorporated into Parts 121 and 135 operations specifications.

Airport Noise Assessment Working Group

[NOTE: This working group has completed its work.]

FAA Rep.: Wes Te Winkle
Phone: (202) 267-3726
FAX: (202) 267-5230

ARM Liaison: Larry Buehler
Phone: (202) 267-8580
FAX: (202) 267-5075

Task: Analyze and evaluate the noise distribution patterns that result from close-in and

distant noise abatement departure profiles. Make comparisons between the current national standards, existing non-standard procedures, and proposed national standards and document the effects the noise patterns generated by the proposed standard would have on airport communities.

Controlled Rest on the Flight Deck Working Group

Leader:
R. Curtis Graeber, Boeing
Phone: (206) 393-6688
FAX: (206) 477-0778

FAA Rep.: T. R. Proven
Phone: (202) 267-3704
FAX: (202) 267-5229

ARM Liaison: Linda Williams
Phone: (202) 267-9685
FAX: (202) 267-5075

Task: Determine the feasibility of preplanned rest in the cockpit during long-range flights and, if feasible, determine the criteria for the establishment of such rest periods.

Flight Crewmember Flight/Duty/Rest Requirements Working Group

Chair: Dr. Don Hudson, APMA
Phone: (303) 371-0425

FAA Rep.: Ted De Weese
Phone: (202) 267-3761
FAX: (202) 267-5086

ARM Liaison: Linda Williams
Phone: (202) 267-9685
FAX: (202) 267-5075

Task: To determine whether regulations pertaining to air carrier flight crewmember, flight, duty, and rest requirements are consistently interpreted and understood by the FAA, air carriers, and pilots. Evaluate industry compliance/practices regarding scheduling of duty, reserve, and rest periods and reports of excessive pilot fatigue as a result of such scheduling. If appropriate, develop recommendations for advisory material and/or a regulatory revision.

All Weather Operations Working Group

Chair: John Ackland, Boeing
Phone: (206) 294-0730
FAA Rep.: Jim Enias
Phone: (202) 267-7211

ARM Liaison: Linda Williams
Phone: (202) 267-9685
FAX: (202) 267-5075

Task: To review and revise FAA advisory material associated with the certification and operational approval for all-weather operations, in particular lower weather minimums, in conjunction with the FAA/JAA harmonization work program.

Single Engine-IMC with Passengers Working Group

[NOTE: Working group now being formed]

Chair: Joe Sprague, NATA
Phone: (703) 845-9000
FAX: (703) 845-8176

FAA Rep.: B. Busby
Phone: (202) 267-5311

ARM Liaison: Larry Buehler
Phone: (202) 267-8580
FAX: (202) 267-5075

Task: Review the Canadian policy authorizing single engine IMC operations in turbine-powered airplanes and make recommendations for adoption. Re-examine existing policies for commercial IMC and/or night operations by single-engine aircraft. Determine the conditions and/or limitations which should be met before commercial air transport IMC and/or night operations by single-engine aircraft could be permitted. When considering the applicability of such operations, include both airplanes and helicopters (both turbine and reciprocating engines), passenger carriage (FAA), passenger/cargo carriage (JAA).

ATTN: ALL REPAIR AGENCIES



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AJN	Air India	CSA	Czechoslovak Airlines	LHA	Lufthansa German Airlines	SIA	Singapore Airlines
NZA	Air New Zealand	DLA	Delta Air Lines	MHA	Malaysian Airlines System	SWR	Swissair
PXB	Air Niugini	ETH	Ethiopian Airlines	HGA	Malév Hungarian Airlines	TGA	Thai Airways International
AZC	Alitalia	BRE	EVA Airways	NWA	Northwest Airlines	TUA	Tunisair
ANA	All Nippon Airways	EFA	Fairair, Inc	OAL	Olympic Airways	TWA	Trans World Airlines, Inc
AAT	American Airlines	FTI	Federal Express	PKC	Pakistan Int'l Airlines	USA	USAir
ANS	Ansett Industries	FIN	Finnair	PAL	Philippine Airlines	UAS	United Airlines
AV7	Aviaca	GAI	Garuda Indonesia	QF2	Qantas Airways, Ltd	5XU	United Parcel Service
BAW	British Airways	IBM	Iberia International Airlines	TNX	Qantas/Australian Airlines	VRG	Varig
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CXA	Cathay Pacific Airways						

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